

January 7, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

Re: Petition of PECO Energy Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan; Docket No. M-2020-3020830

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures

c: Deputy Chief Administrative Law Judge Mark A. Hoyer (via E-mail)
Administrative Law Judge Emily DeVoe (via E-mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of its Act 129 Phase IV Energy : **Docket No. M-2020-3020830**
Efficiency and Conservation Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL

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Barry A. Naum

Dated: January 7, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of its Act 129 Phase IV Energy : Docket No. M-2020-3020830
Efficiency and Conservation Plan :

**PETITION TO INTERVENE OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, Industrial Energy Consumers of Pennsylvania ("IECPA"), hereby file this Petition to Intervene in the above-captioned proceeding.

In support thereof, IECPA states as follows:

1. Petitioner is IECPA. The current composition of IECPA for the purpose of this proceeding is attached as Appendix "A." Appendix "A" will be updated as necessary.

2. The name and address of Petitioners' attorneys are:

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Barry A. Naum
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3. On November 30, 2020, PECO Energy Company ("PECO" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for approval of the Company's Phase IV Energy Efficiency and Conservation ("EE&C") Plan ("Phase IV Plan" or "Plan"), pursuant to the requirements of Act 129 of 2008, 66 Pa. C.S. § 2806.1 ("Act

129") and the PUC's Implementation Order entered on June 18, 2020, at Docket No. M-2020-3015228.

4. IECPA is an association of energy-intensive industrial consumers with some members taking service from PECO primarily pursuant to the Company's current industrial distribution and transmission rates. The cost of electricity provided by the Company, including the cost of EE&C Plan and measures, is a significant element in the cost of operation for an IECPA member. The Commission's action in this case may therefore have a significant impact on that member and others, as they are identified.

5. The Commission's resolution of PECO's Phase IV Plan may directly impact the terms and conditions of the electric service that IECPA members receive from the Company. IECPA therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. See 52 Pa. Code § 5.72(a)(2) & (3).

WHEREFORE, the Industrial Energy Consumers of Pennsylvania requests that the Commission grant this Petition to Intervene and provide IECPA with full party status in this proceeding.

Respectfully submitted,

By 

Derrick Price Williamson (Pa. I.D. No. 69274)

Barry A. Naum (Pa. I.D. No. 204869)

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Counsel to Industrial Energy Consumers of Pennsylvania

Dated: January 7, 2021

VERIFICATION

I, Barry A. Naum, Counsel to Industrial Energy Consumers of Pennsylvania, hereby state that the factors set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: January 7, 2021



Barry A. Naum

APPENDIX A
CURRENT MEMBERS OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA

Cleveland-Cliffs Inc.